

Karen M. Klaver F0241  
Heather L Kennedy F0246  
C.N.M.I. Public School System  
P.O. Box 1370 CK  
Saipan, MP 96950

Telephone: (670) 237-3046  
Fax: (670) 664-3713

Attorneys for: CNMI Public School System

**IN THE UNITED STATES DISTRICT COURT  
FOR THE  
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS**

<b>LISA S. BLACK,</b>	)	<b>CIVIL ACTION NO. 05-0038</b>
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	
	)	<b>CNMI PUBLIC SCHOOL SYSTEM'S</b>
<b>JIM BREWER, COMMONWEALTH OF</b>	)	<b>REQUEST TO ENTER BILL OF</b>
<b>THE NORTHERN MARIANA ISLANDS,</b>	)	<b>COSTS</b>
<b>COMMONWEALTH OF THE NORTHERN</b>	)	
<b>MARIANA ISLANDS PUBLIC SCHOOL</b>	)	
<b>SYSTEM, and JOHN AND/OR JANE DOE,</b>	)	
	)	
<b>Defendants.</b>	)	
	)	

**CNMI Public School System's Request to Enter Bill of Costs**

COMES NOW defendant, CNMI Public School System, by counsel and requests judgment in the costs of \$8993.71 against plaintiff Lisa Black pursuant to Fed. R. Civ. P 54(d), LR 54.1, and 28 USCA §1920 and 28 USCA §1924 for costs.

Defendant states as follows:

1. Lisa Black is the plaintiff in this case.

2. Defendants are the CNMI Public School System, Jim Brewer and the Commonwealth of the Northern Mariana Islands.
3. On February 28, 2007, after a jury trial, the court entered judgment that the plaintiff recovers nothing and that "An order for costs will be entered separately."
4. On January 5, 2007 the court granted partial summary judgment in favor of defendants.
5. Pursuant to Fed R. Civ. P. 54 (d) the defendant, as a prevailing party is entitled to an award of all costs against plaintiff Lisa Black.
6. The bill of costs, except for attorney fees, is attached at Exhibit A with supporting documentation, as costs that are allowed by law.
7. The affidavit of counsel for defendant (Exhibit B) is attached showing that the undersigned has knowledge of the pertinent facts, the items of costs are accurate and were necessarily incurred in his case, and that the items of services for which costs are sought were actually and necessarily performed.
8. Request for attorney fees are made in a separate motion.

Submitted this 8<sup>th</sup> day of March, 2007.

CNMI PUBLIC SCHOOL SYSTEM  
Attorneys for the Public School System

\_\_\_\_\_/s/\_\_\_\_\_  
Heather L. Kennedy F0246  
Karen M. Klaver F0241

**Exhibit A****DEFENDANT PSS' ITEMIZED COSTS**

Lisa Black Trial Case

Case No. 05-0038 USDC

1.	Jim Brewer, witness (R/T California)	-	\$3,560.56
2.	Florine Hofschneider, witness (R/T Tinian;)	-	\$128.00
3.	Videoconference Fee  Joseph Connolly in Las Vegas \$4.42 p/minute @ 120minutes Receipt #50281525	-	\$530.40
4.	Witness Fee \$40 p/p (3x)  1. Olga Arriola 2. Dolores Taman 3. Rita Hocog Inos, Ed.D.	-	\$120.00
5.	Defendant's Exhibits  Original + 7 binders 2152 cps @ 50 cents per copy	-	\$1,076.00
6.	Plaintiff's Exhibits  PSS copy + 1 304 cps @ 50 cents per copy	-	\$152.00

1	7.	PSS' Production of Documents Requested	-	\$1,959.00
2		(Bate stamped)		
3		3918 cps @ 50 cents per copy		
4	8.	Medical Record Copies from Marianas	-	\$15.75
5		Medical Center		
6		Invoice no. 0609-015244-A		
7				
8	9.	Deposition Transcript of Lisa Black	-	\$1,452.00
9		(August 7-8, 2006)		
10				
11		<b>Total</b>		<b><u>\$8,993.71</u></b>

**Exhibit B**

**Affidavit of Karen M. Klaver**

I, Karen M. Klaver, do state as follows:

1. I am one of the legal counsels for the defendant CNMI Public School System in Civil Action No. 05-0038, in which the clerk entered judgment on February 28, 2007.
2. I have knowledge of the pertinent facts relating to costs incurred in this case.
3. The items of costs listed for transcripts of depositions, copy costs, travel costs and witness fees are accurate and were necessarily incurred in the defense of this case.
4. The items for of services for which costs are sought were actually and necessarily performed in the defense of this case.
5. I declare under penalty of perjury that the above it true.

Dated this 8<sup>th</sup> day of March, 2007.

\_\_\_\_\_/s/\_\_\_\_\_  
Karen M. Klaver, F0241